



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

Color Country District Office
Henry Mountains Field Station
PO Box 99
Hanksville, Utah 84734
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In Reply Refer To:

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October 20, 2011

RECEIVED

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DIV. OF OIL, GAS & MINING

Mr. Kim Wilson
Greentech Mining Utah, LLC
PO Box 215
Hanksville, UT 84734

Subject: Deficient Plan of Operations to Commence Small Mining Operations,
Greentech Mining Utah, LLC, Golden Eagle Mine, NW $\frac{1}{4}$ NE $\frac{1}{4}$ NE $\frac{1}{4}$, Sec. 29, T.31 S., R.
11 E., SLB&M.

Dear Mr. Wilson:

The Bureau of Land Management (BLM) has received and reviewed your Plan of Operations (Plan) to commence mining operations at your Golden Eagle #103 claim and has identified the following specific deficiencies:

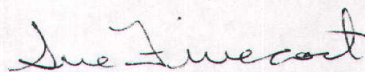
1. Please correct numbers 5 and 6 on page 3 of your submittal to reflect ownership of land surface and minerals.
2. On page 4, III Operation Plan number 8, you indicate a total of 3.67 acres to be disturbed. However in your, un-paginated, Plan of Operations narrative you state "The Golden Eagle Mine would consist of 8.264 acres...." Please resolve the discrepancy between listed acreages.
3. Please provide a map or maps with scale and north arrow, preferably a topographic map, or sketch, of the proposed **total** disturbed acreage to include, as applicable, mining claim location(s), exploration activities, drill sites, mining activities, processing facilities, waste rock and tailing disposal areas, support facilities, structures, buildings, and access routes including proposed road(s).
Note: temporary access routes that are constructed by the operator shall be constructed and maintained to assure adequate drainage and to control or prevent damage to soil, water, and other resource values. Cross drains, dips, water bars,

road surface and other structures ancillary to road construction shall be shaped to as near a natural contour as practicable and to minimize cut and fill.

4. Please provide a list of *all* equipment to be used in your operation including non-mining equipment such as storage facilities, temporary trailers and buildings. Please include the proposed locations of these utilities and facilities in your map.
5. Please identify and list any chemicals or substances, hazardous and non-hazardous that will be used in your operations or stored on site. Include the storage location(s) in your map and provide a detailed description of the use of each chemical or substance in your Plan.
6. You indicate in your Plan that you anticipate encountering "bedrock" at approximately 50 feet below ground surface. Please provide a contingency in your Plan for handling groundwater should it be encountered during excavation operations.
7. Because your operations will be conducted adjacent to or in the vicinity of a natural stream course, please provide in your Plan contingency to prevent potential operations and construction generated runoff from entering the stream course.
8. A statement promising to avoid undue and unnecessary degradation and;
9. A reclamation promise and plan.
10. A reclamation cost estimate which includes contingency, contractor profit and overhead.

For your convenience we are also providing an excerpt of 43CFR § 3809.401 which covers that information and data that should be included, as applies to your operation, in your Plan of Operations.

Sincerely,



Sue Fivecoat
Assistant Field Manager

Cc: Wayne Western, UDOGM
Opie Abeyta
File

Attachment: 43CFR 3809.401 Excerpt

43CFR § 3809.401 Where do I file my plan of operations and what information must I include with it?

Attachment 1

Under 43CFR § 3809.401 Where do I file my plan of operations and what information must I include with it?

- (a) If you are required to file a plan of operations under §3809.11, you must file it with the local BLM field office with jurisdiction over the lands involved. BLM does not require that the plan be on a particular form. Your plan of operations must demonstrate that the proposed operations would not result in unnecessary or undue degradation of public lands.
- (b) Your plan of operations must contain the following information and describe the proposed operations at a level of detail sufficient for BLM to determine that the plan of operations prevents unnecessary or undue degradation:
 - (1) Operator Information. The name, mailing address, phone number, taxpayer identification number of the operator(s), and the BLM serial number(s) of any unpatented mining claim(s) where disturbance would occur. If the operator is a corporation, you must identify one individual as the point of contact. You must notify BLM in writing within 30 calendar days of any change of operator or corporate point of contact or in the mailing address of the operator or corporate point of contact;
 - (2) Description of Operations. A description of the equipment, devices, or practices you propose to use during operations including, as applicable;
 - i. Maps of the project area at an appropriate scale showing the location of exploration activities, drill sites, mining activities, processing facilities, waste rock and tailing disposal areas, support facilities, structures, buildings, and access routes;
 - ii. Preliminary or conceptual designs, cross sections, and operating plans for mining areas, processing facilities, and waste rock and tailing disposal facilities;
 - iii. Water management plans;
 - iv. Rock characterization and handling plans;
 - v. Quality assurance plans;
 - vi. Spill contingency plans;
 - vii. A general schedule of operations from start through closure; and
 - viii. Plans for all access roads, water supply pipelines, and power or utility services;
 - (3) Reclamation Plan. A plan for reclamation to meet the standards in §3809.420, with a description of the equipment, devices, or practices you propose to use including, where applicable, plans for;

- i. Drill-hole plugging;
- ii. Regrading and reshaping;
- iii. Mine reclamation, including information on the feasibility of pit backfilling that details economic, environmental, and safety factors;
- iv. Riparian mitigation;
- v. Wildlife habitat rehabilitation;
- vi. Topsoil handling;
- vii. Revegetation;
- viii. Isolation and control of acid-forming, toxic, or deleterious materials;
- ix. Removal or stabilization of buildings, structures and support facilities; and
- x. Post-closure management;

(4) Monitoring Plan. A proposed plan for monitoring the effect of your operations. You must design monitoring plans to meet the following objectives: To demonstrate compliance with the approved plan of operations and other Federal or State environmental laws and regulations, to provide early detection of potential problems, and to supply information that will assist in directing corrective actions should they become necessary. Where applicable, you must include in monitoring plans details on type and location of monitoring devices, sampling parameters and frequency, analytical methods, reporting procedures, and procedures to respond to adverse monitoring results. Monitoring plans may incorporate existing State or other Federal monitoring requirements to avoid duplication. Examples of monitoring programs which may be necessary include surface- and ground-water quality and quantity, air quality, revegetation, stability, noise levels, and wildlife mortality; and

(5) Interim management plan. A plan to manage the project area during periods of temporary closure (including periods of seasonal closure) to prevent unnecessary or undue degradation. The interim management plan must include, where applicable, the following:

- i. Measures to stabilize excavations and workings;
- ii. Measures to isolate or control toxic or deleterious materials (See also the requirements in §3809.420(c)(12)(vii).);
- iii. Provisions for the storage or removal of equipment, supplies and structures;
- iv. Measures to maintain the project area in a safe and clean condition;
- v. Plans for monitoring site conditions during periods of non-operation; and
- vi. A schedule of anticipated periods of temporary closure during which you would implement the interim management plan, including provisions for notifying BLM of unplanned or extended temporary closures.

a) In addition to the requirements of paragraph (b) of this section, BLM may require you to supply;

- i. Operational and baseline environmental information for BLM to analyze potential environmental impacts as required by the National Environmental Policy Act (NEPA) and to determine if your plan of operations will prevent unnecessary or undue degradation. This could include information on public and non-public lands needed to characterize the geology, paleontological resources, cave resources, hydrology, soils, vegetation, wildlife, air quality, cultural resources, and socioeconomic conditions in and around the project area, as well as information that may require you to conduct static and kinetic testing to characterize the potential for your operations to produce acid drainage or other leachate. BLM is available to advise you on the exact type of information and level of detail needed to meet these requirements; and
 - ii. Other information, if necessary to ensure that your operations will comply with this subpart.
- (c) Reclamation cost estimate. At a time specified by BLM, you must submit an estimate of the cost to fully reclaim your operations as required by §3809.552. BLM will review your reclamation cost estimate and notify you of any deficiencies or additional information that must be submitted in order to determine a final reclamation cost. BLM will notify you when we have determined the final amount for which you must provide financial assurance.